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Attorney for AARON BROTHERS, INC., Defendant

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

DMITRY YANUSHKEVICH,)	Case No. 16-cv-3019-EMC
Plaintiff,)	
)	JOINT STIPULATION AND
vs.)	[PROPOSED] ORDER
)	EXTENDING TIME TO
AARON BROTHERS, INC., a Delaware)	RESPOND TO PLAINTIFF’S
corporation, d/b/a AARON BROTHERS)	COMPLAINT
ART & FRAMING; ALEX DELLY, an)	
individual; SHARON K. DELLY, an)	
individual; ROBERT G. BLATMAN, an)	
individual; and DOES 1-20 inclusive,)	
Defendants.)	
)	
)	

WHEREAS, in the interest of conserving party and judicial resources and exploring the possibility of an early resolution, Plaintiff Dmitry Yanushkevich (“Plaintiff”), has provided Defendant Aaron Brothers, Inc., Defendant Alex Delly, Defendant Sharon K. Delly, and Defendant Robert G. Blatman (collectively, “Defendants”) with a settlement demand, Defendants have responded and the parties are actively engaged in productive settlement discussions;

WHEREAS, a resolution of the case would obviate Defendants’ need to respond to the Complaint;

1 WHEREAS, the parties have previously stipulated to extend Defendants' deadline to
2 respond to the Complaint;

3 Pursuant to Local Rule 6-2, IT IS HEREBY STIPULATED AND AGREED to by and
4 between the parties, subject to the approval of the Court, that the following deadlines apply:

5 November 11, 2016 Last Day for Defendants to Respond to Complaint

6 November 11, 2016 Last Day for Plaintiff to file "Notice of Need for
7 Mediation"

8 No provision of this Stipulation shall be construed as a waiver of any and all claims or
9 defenses available to either Plaintiff or Defendants, and any and all such claims and defenses are
10 hereby expressly reserved.

11 IT IS SO STIPULATED.

12 Dated: October 26, 2016

13 /s/ Irene Karbelashvili
14 Irene Karbelashvili, Attorney for
15 Plaintiff Dmitry Yanushkevich

16 Dated: October 26, 2016

17 /s/ John Bosco
18 John Bosco, Attorney for
19 Defendant Aaron Brothers, Inc.

20 **FILER'S ATTESTATION**

21 Pursuant to Local Rule 5-1, I hereby attest that I, John D. Bosco, received the
22 concurrence of counsel for Plaintiff in the filing of this document.

23 By: /s/ John Bosco
24 JOHN BOSCO

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[PROPOSED] ORDER

Based on the foregoing stipulation, IT IS SO ORDERED that the following deadlines apply:

November 11, 2016 Last Day for Defendants to Respond to Complaint

November 11, 2016 Last Day for Plaintiff to file "Notice of Need for Mediation"



EDWARD M. CHEN
JUDGE